

Agrium Conda Phosphate Operations

Agrium's Response to EPA's Letter Dated August 31, 2005

Agrium asserts a claim of confidentiality with respect to the information contained herein. The information to which this confidentiality claim applies constitutes trade secret, privileged or confidential commercial or financial information, and/or information specifically exempted from disclosure by statute. Such information has been maintained in confidence by Agrium and is not reasonably obtainable by use of legitimate means without Agrium's consent, and Agrium intends to continue its existing practice of protecting the confidentiality of all information subject to this claim of confidentiality.

Public disclosure of the information for which Agrium asserts this confidentiality claim would cause substantial harm to Agrium's competitive position. Furthermore, the information to which this claim applies does not constitute emission data, standards or limitations within the meaning of Clean Air Act §114(c), or other similar relevant federal and/or state provisions. This information includes commercial and/or financial-related information regarding confidential, commercially valuable plans, processes or devices. Because Agrium's business is highly competitive in nature, the disclosure of any such information would substantially harm Agrium's business position by depriving it of an advantage inherent in such information, and/or by providing Agrium's competitors with the ability to derive a benefit from such information to Agrium's detriment. For example, certain information to which this claim applies potentially could be used by Agrium's competitors to project Agrium's future production and/or pricing patterns, to gain insight into Agrium's proprietary process designs and/or production and marketing strategies, and/or to negatively influence public/consumer perceptions of Agrium and Agrium products.

In the event that EPA, or the Idaho Department of Environmental Quality ("IDEQ") receives a request for public disclosure of any information contained herein, Agrium requests that EPA and/or IDEQ notify Agrium immediately upon receiving any such request, notify Agrium of any determination by EPA and/or IDEQ with respect to the confidentiality of such information, and provide Agrium an opportunity to comment regarding any such EPA/IDEQ determination prior to the public disclosure of the requested information.

BATES PREFIX	BEG BATES	END BATES	DATE	DOC TYPE	AUTHOR	RECIPIENT	DESCRIPTION
AGR-CBI	003834	003839		Chart	Wolf, Steve; Agrium Conda Phosphate Operations		Chart of Storage/Placement Locations

Storage/Placement Location	Describe the type of unit used for placement or storage	Approximate dimensions, volume or storage capacity	Mat'l of Const or Lined	Date Installed or First Used	How Materials are added and removed and description of pipelines or other conveyance leading to area	Duration of placement or Storage	Frequency of Disposal	Maintenance, inspection, monitoring, and repair activity	Reportable releases or discharges in the last 5 years
Sulfuric Acid Storage	Seven (7) above ground storage tanks	Two (2) tanks 52'd x 34'h One (1) tank 75'd x 34' h Four (4) tanks 45'd x 23.5'h	Carbon Steel	Tanks 1,2,3 were installed in 2001. Tanks 5,6,7,and 8 were installed in 1994,	Sulfuric acid enters the storage tanks via pipeline from railcar unloading and the sulfuric acid plant. Sulfuric acid is removed via pumps and pipeline.	Average turnover of tank inventory (all tanks utilized) is approximately 40 days. Not all tanks are normally in use, and actual turnover occurs more frequently.	N/A	Tanks 1,2,3 were inspected at commissioning in 2001. Tanks 5,6,7,and 8 were surveyed for thickness in 2002 and had limited internal inspection in 2005.	No reportable releases or discharges in past 5 years
Sulfur Storage Tank	One (1) above ground storage tank	37'd x 24'h	Carbon Steel	Current tank installed 1994.	Sulfur enters the tank via pipeline from the sulfur pit pumps. Sulfur exits via pipeline to the sulfur pit.	Average turnover of sulfur in the tank is ~ 6 days.	N/A	Thickness survey of shell and roof in 2002 and 2005.	No reportable releases or discharges in past 5 years
Sand Storage Area SW	Bare land	Approximate dimensions of storage area are 75' x 90'. Typical sand storage ~ 2000 tons	Bare Land	~ 1965	Purchased sand is brought in by truck. Sand is removed by mobile equipment.	Sand stockpile is built in a single annual campaign and consumed throughout the year.	N/A	N/A	No reportable releases or discharges in past 5 years A
Sand Storage Area NE	Bare land	Approximate dimensions of area are 35' x 50'. Typical storage ~100 tons.	Bare land / partial concrete pavement	~1965	Sand is added and removed by mobile equipment.	Stockpile is replenished from main sand stockpile as required. Average turnover is ~ 30 days.	N/A	N/A	No reportable releases or discharges in past 5 years
Ammonia Sphere	Above ground storage vessel (sphere)	42' diameter sphere	Carbon Steel	1965	Ammonia is added via pipeline from railcar unloading. Ammonia is removed via pipeline to granulation or customer loading.	Average turnover of ammonia sphere contents is ~ 6 days	N/A	Internal inspection and thickness survey in 1994 and 1999. Acoustic emissions test in 2004.	No reportable releases or discharges in past 5 years
Dust Control Reagent Storage Tanks	Two above ground storage tanks	One (1) Tank 11'd x 20'h One (1) Tank 10'd x 16'h	Carbon Steel	Unknown ~1994	Dust suppressant is pumped into tank from delivery truck. Suppressant is removed via pipeline to granular product ribbon blenders.	Average turnover of tanks is ~ 40 days	N/A	11' x 20' tank external thickness check and internal inspection in 2003. 10' x 16' tank external thickness checks in 2003 and 2004	No reportable releases or discharges in past 5 years
Sodium Hydroxide Storage Tanks	Above ground storage tanks in containment area	One (1) Tank 8'd x 12'h One (1) Tank 13'd x 15'h	Carbon Steel	Unknown Unknown	Sodium hydroxide is pumped into tank from delivery truck. Sodium hydroxide is removed via pipeline to anion exchange columns	Average turnover of tanks is ~ 4 months.	N/A	8'x12' tank external thickness test 1998, internal visual inspection and thickness test on floor and shell 2003, external visual inspection 2005. 13'x15' tank external thickness test on shell 2001, external visual inspection 2005.	No reportable releases or discharges in past 5 years

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Limestone Storage Silo	Above ground storage silo	~1850 ft ³	Carbon Steel	~1995	Limestone is pneumatically conveyed into silo from delivery trucks. Limestone removed from silo by screw feeder.	Average turnover of limestone silo is ~ 2 weeks	N/A	Routine maintenance as needed	No reportable releases or discharges in past 5 years
Dry Product Storage	Warehouse	Approximate dimensions 1080' x 100' with ~60,000 tons storage capacity.	Concrete floor inside building	~1965	Added by conveyor system. Removed by mobile equipment.	Average turnover of dry product is approximately 60 days, however stockpile/reclaim process is not first-in / first-out.	N/A	Routine maintenance as needed	No reportable releases or discharges in past 5 years
Granular Fines Stockpile	Warehouse	Shares floor space with dry product storage	Concrete floor inside building	~1965	Added and removed by mobile equipment.	Average turnover of granular fines is approximately 70 days, however stockpile/reclaim process is not first-in / first-out.	N/A	Routine maintenance as needed	No reportable releases or discharges in past 5 years
Urea Bin	Bin	300 tons	Carbon Steel	2001	Added via pneumatic truck unloading and removed by conveyor.	Stored for granular product grade control as may be necessary.	N/A	External inspection in 2005	No reportable releases or discharges in past 5 years
Emergency pond	Lined Pond	300,000 gallons	Double liner - HDPE	2001	Decommissioned with PPA plant shutdown in 2003. Collects precipitation run-off falling on lined area only. Collected water removed via evaporation. Excessive accumulation is pumped away through the storm run-off system	N/A	Dependent on precipitation.	Inspected during normal operator rounds	No reportable releases or discharges in past 5 years
Ore Pile	Bare Land	~1,750,000 Wet Tons Ore	Bare Land	mid-1960s	Train delivers ore to weigh feeder, weigh feeder to conveyors and conveyors to top of stockpile. Cats move material to screens and ore passes through screens onto the wash plant feed conveyor.	Approximately 8 Months	N/A	Continuously moving ore and monitoring piles	No reportable releases or discharges in past 5 years
Washed Ore Stockpile	Bare Land	~90,000 Wet Tons Ore	Bare Land	mid-1960s	Vacuum dried ore from the wash plant is conveyed to the top of the pile. As necessary a front end loader dumps ore onto conveyor for ball mill feed.	Approximately 2 months	N/A	Continuously moving ore and monitoring piles	No reportable releases or discharges in past 5 years

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Reject Rock Pit	Bare Land	~100 Tons	Bare Land	mid-1960s	Oversize ore chunks roll off the wash plant feed screen into the pit. The ore is placed back on the stockpile and crushed with bulldozers and fed back to the wash plant	Approximately 2 months	N/A	Daily monitoring of pile size	No reportable releases or discharges in past 5 years
Cowley Lake	Bare Land	~300,000 gallons	Bare land	mid-1960s	Runoff water and overflow from the tailings sump. A pump sends liquid/tailings to the tailings pond and dry tailings are removed by front end loader	Tailings overflows approximately 6 times/year.	N/A	Water is transferred to tailings ponds as necessary. When pond is dry tailings are removed to the tailings pond using a front-end loader.	No reportable releases or discharges in past 5 years
#1 Gypsum Stack	Stack	Surface area 20 acres. Stack extends from ground elevation to ~100 feet above ground elevation.	Native materials, synthetic liner	Mid 1960s	A gypsum/pond water slurry is pumped to the gypsum stack. Cooling pond water decants to the cooling ponds via ditches.	Long Term	None	6 or 7 days/week Dike, Ditch, Pipe and Pump Inspections. Weekly pump maintenance checks. Gypsum stack pond maintenance daily 8 to 9 months per year.	No reportable releases or discharges in past 5 years
#2 Gypsum Stack	Stack	#2 & #3 gypsum stack combined surface area 50 acres. Elevation from ground to ~175 feet above ground.	Native materials, synthetic liner	Early 1970s	A gypsum/pond water slurry is pumped to the gypsum stack. Cooling pond water decants to the cooling ponds via ditches.	Long Term	None	6 or 7 days/week Dike, Ditch, Pipe and Pump Inspections. Weekly pump maintenance checks. Gypsum stack pond maintenance daily 8 to 9 months per year.	No reportable releases or discharges in past 5 years
#3 Gypsum Stack	Stack	#2 & #3 gypsum stack combined surface area 50 acres. Elevation from ground to ~175 feet above ground elevation.	Native materials, synthetic liner	Early 1970s	A gypsum/pond water slurry is pumped to the gypsum stack. Cooling pond water decants to the cooling ponds via ditches.	Long Term	None	6 or 7 days/week Dike, Ditch, Pipe and Pump Inspections. Weekly pump maintenance checks. Gypsum stack pond maintenance daily 8 to 9 months per year.	No reportable releases or discharges in past 5 years
#3 Tailings Pond (Gypsum Stack)	Stack	Surface area 50 acres. Elevation from ground to ~145 ft above ground level.	60 feet of tailings	Late 1970s	A gypsum/pond water slurry is pumped to the gypsum stack. Cooling pond water decants via ditches to the cooling ponds.	Long Term	None	6 or 7 days/week Dike, Ditch, Pipe and Pump Inspections. Weekly pump maintenance checks. Gypsum stack pond maintenance daily 8 to 9 months per year.	No reportable releases or discharges in past 5 years

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West Gypsum Stack	Lined Stack	~125 Acres	Clay liner, 60 mil HDPE liner and 2 feet of compacted gypsum	Dec 2005	A gypsum/pond water slurry is pumped to the gypsum stack via pipeline. Cooling pond water decants from the gypsum stack via ditches to the cooling ponds.	Long Term	None	6 or 7 days/week Dike, Ditch, Pipe and Pump Inspections. Weekly pump maintenance checks. Gypsum stack pond maintenance daily 8 to 9 months per year.	No reportable releases or discharges in past 5 years
#1 Tailings Pond	Pond	~20 acres	Native materials	1970s	Rainfall, water may overflow from #2 tailings pond to #1 tailings pond. Evaporation.	Long Term	None	5 or 6 days per week inspection of dikes. Daily inspections of pipe and pump equipment.	No reportable releases or discharges in past 5 years
#2 Tailings Pond	Pond	~20 acres	Native materials	1970s	Rainfall, clarified water is pumped via pipeline from #4 tailings pond to #2 tailings pond. Water from #2 tailings pond is pumped to the wash plant.	Long Term	None	5 or 6 days per week inspection of dikes. Daily inspections of pipe and pump equipment.	No reportable releases or discharges in past 5 years
#4 Tailings Pond	Pond	~250 acres	Native materials	1984	Rainfall, the tailings slurry is pumped via pipeline from the wash plant to #4 tailings pond. Water is generally pumped to the #2 tailings pond or infrequently is pumped directly to the wash plant.	Long Term	None	5 or 6 days per week inspection of dikes. Daily inspections of pipe and pump equipment.	No reportable releases or discharges in past 5 years
East Cooling Pond	Lined Pond	Surface area ~17 acres	60 mil HDPE Lined, clay liner underneath	1996	Pond water from the plant returns to the cooling pond via pipeline then is pumped back via pipeline to various locations in the plant.	30 days	None	5 to 6 days/week visual inspection of dikes, liners and lysimeters. Daily visual review and weekly maintenance review of pumping equipment and associated piping.	No reportable releases or discharges in past 5 years
West Cooling Pond	Lined Pond	Surface area ~17 acres	60 mil HDPE Lined, clay liner underneath	1996	Pond water from the plant returns to the cooling pond via pipeline then is pumped back to the plant.	30 days	None	5 to 6 days/week visual inspection of dikes, liners and lysimeters. Daily visual review and weekly maintenance review of pumping equipment and associated piping.	No reportable releases or discharges in past 5 years
Long Term Storage (NORM)	Gypsum stack storage	~5 acres	Gypsum	Fall 1999	NORM materials are placed here for long-term storage.	Long Term	None	5 to 6 days/week visual inspection. Gypsum is used to cover NORM material.	No reportable releases or discharges in past 5 years

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C&D Landfill	Landfill	~75000 cubic yards	60 mil HDPE lined at bottom, clay lined at top	Fall 1999	By permit, construction or demolition debris is deposited in the landfill	Permanent. Leachate from landfill is collected and is pumped out annually.	None	Inspected on a monthly and yearly basis.	No reportable releases or discharges in past 5 years
Process Sewer Lined Pond	Lined Pond	~500,000 gallons	60 mil HDPE lined	1990	Liquid collected from trenches and pipes flows to the process sewer sump and pond. The sump pump sends liquid via pipeline to the cooling ponds.	Short term, sump pumps pond down periodically throughout the day.	None	Internal sump inspection and repairs October 2005. Next inspection 2006.	No reportable releases or discharges in past 5 years
Flocculant N300 LMW Storage	Super sacks wrapped in plastic on wood pallets	~1800 lbs	Polypropylene sack, plastic cover	August 2001	Trucks delivered sacks are placed in the storage location. Sacks are carried by forklift to flocc shack and hung over the dry flocc storage bin	Approximately 60 days	None	Sacks are inspected for damage on delivery and before transport to flocc shack.	No reportable releases or discharges in past 5 years
Flocculant 1236 Storage	Plastic Tote	~2500 lbs	HDPE	August 2001	Truck delivered totes are placed in storage location. Flocculant is pumped to a water mixer and then to the clarifiers.	Approximately 60 days	None	Totes are visually inspected on arrival and tote in service is visually inspected daily	No reportable releases or discharges in past 5 years
Antifoam Storage	Plastic Tote	2200 lbs	HDPE	Unknown	Antifoam from new tote is pumped via pipeline to the storage tote from which it is pumped to the process.	Approximately 60 days	None	Totes are visually inspected on arrival and tote in service is checked daily	No reportable releases or discharges in past 5 years
Nitric Acid Storage	Tank	~7500 gallons	304L	August 2001	Nitric acid delivered by truck. Nitric acid pumped from tank into concentrated phosphoric acid stream	Approximately 15 days	N/A	Inspected June 2003, June 2005. Next inspection in approximately 10 years.	No reportable releases or discharges in past 5 years
Plant 90 Day Storage Area	Steel or Plastic Drum	20'X20' 50 Drums	Steel Building with Concrete floor	1997	55 gal drums are taken out by hand and disposed of off site.	Less than 90 Days	Less than 90 days from the full date marked on the individual drum.	Inspected weekly	No reportable releases or discharges in past 5 years
Plant Satellite Accumulation Areas E&I Shop / Rubber Shop	55 Gallon Drum	55 Gallons	Plastic or Steel	Jan 2001	Waste is placed directly into drum.	When full, the barrel is dated and placed in the plant 90 Day Storage Building.	Less than 90 days from the full date marked on the drum.	Check to see that it is properly labeled and dated.	No reportable releases or discharges in past 5 years
Lab Phosphoric Acid Sample Returns	Carboy	5 Gallons	Polypropylene	Jan 2001	Excess phosphoric acid is poured into the carboy. When full, the carboy is capped and returned to operations for recycle.	The phosphoric acid in the carboy is recycled on an as needed basis- usually once or twice a week.	N/A	Check to see that it is properly labeled as recycle acid.	No reportable releases or discharges in past 5 years

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Lab Granular Sample Returns	Bucket	5 Gallons	Plastic	Sep 2005	Excess granular sample is poured directly into the bucket. When full, the bucket is returned to operations for recycle	The granular sample is recycled on an as needed basis-usually once or twice a week.	N/A	None	No reportable releases or discharges in past 5 years
Lab Rock Sample Returns	Steel Drum	480 Gallons	Steel	Prior to 1988	Excess ore sample is poured directly into the drum. When full, the drum is returned to operations for recycle	The ore sample is recycled on an as needed basis-usually once or twice a month.	N/A	None	No reportable releases or discharges in past 5 years
Gypsum Sample Returns	Bucket	5 Gallons	Plastic	Sep 2005	Excess gypsum sample is poured directly into the bucket. When full, the bucket is returned to operations for recycle	The gypsum is recycled on an as needed basis-usually once or twice a week.	N/A	None	No reportable releases or discharges in past 5 years
Lab Hazardous Waste Storage Building	Drums	The building will hold eight 55 gallon drums	Drums stored in metal building with concrete floor	Jan 2001	When full, 55 gallon drums are dated and placed into the lab hazardous waste building from the lab satellite accumulation area.	Less than 90 days from the full date on the drum.	Less than 90 days from the full date on the drum.	The building is inspected on a weekly basis or when waste is added to the building.	No reportable releases or discharges in past 5 years
Lab Satellite Accumulation Area	55 Gallon Drum	55 Gallons	Plastic	Jan 2001	Wastes containing, quinoline, acetone, methanol and phosphoric acid are placed in this drum.	When full, the drum is dated and placed in the Lab Hazardous Waste Storage Building.	-	Check to see that drum is properly labeled and dated.	No reportable releases or discharges in past 5 years